

All Cases: Debtor(s) David M Laz Case No. 18-16460 Chapter 7

All Cases: Moving Creditor DEUTSCHE BANK NATIONAL TRUST COMPANY, AS Date Case Filed 6/8/18  
TRUSTEE FOR MORGAN STANLEY IXIS REAL ESTATE  
CAPITAL TRUST 2006-2 MORTGAGE PASS THROUGH  
CERTIFICATES, SERIES 2006-2

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) \_\_\_\_\_

Chapter 13: Date of Confirmation Hearing \_\_\_\_\_ or Date Plan Confirmed \_\_\_\_\_

Chapter 7: ☐ No-Asset Report filed on \_\_\_\_\_  
☒ No-Asset Report not Filed, Date of Creditor's Meeting: 07/10/2018

1. Collateral
  - a. Home ☒
  - b. Car \_\_\_\_\_ Year, Make and Model \_\_\_\_\_
  - c. Other \_\_\_\_\_
2. Balance Owed as of 06/27/2018: \$1,181,299.45  
Total of all other Liens against Collateral: \$3,650.00
3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.
4. Estimated Value of Collateral (must be supplied in *all* cases) \$500,000.00, per Debtor's Schedules.
5. Default
  - a. ☒ Total Default as of 06/27/2018  
Number of months 118 Amount \$744,284.44
  - b. ☐ Post-Petition Default
    - i. ☐ On direct payments to the moving creditor  
Number of months \_\_\_\_\_ Amount \_\_\_\_\_
    - ii. ☐ On payments to the Standing Chapter 13 Trustee  
Number of months \_\_\_\_\_ Amount \_\_\_\_\_
6. Other Allegations
  - a. ☐ Lack of Adequate Protection § 362(d)(1)
    - i. ☐ No insurance
    - ii. ☐ Taxes unpaid Amount \_\_\_\_\_
    - iii. ☐ Rapidly depreciating asset
    - iv. ☐ Other (describe) \_\_\_\_\_
  - b. ☒ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
  - c. ☐ Other "Cause" § 362(d)(1)
    - i. ☐ Bad faith (describe) \_\_\_\_\_
    - ii. ☐ Multiple filings
    - iii. ☐ Other (describe) \_\_\_\_\_
  - d. Debtor's Statement of Intention regarding the Collateral
    - i. ☒ Retain
    - ii. ☐ Redeem
    - iii. ☐ Surrender
    - iv. ☐ No Statement of Intention Filed

Date: 6/28/2018

/s/ Jose Moreno  
Counsel for Movant